

# **EXHIBIT I**

BINGHAM

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May 23, 2012

**Via Email**

Daniel J. Walker, Esq.  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103-6305

**Re: In re High-Tech Employee Antitrust Litigation,  
11-CV-2509-LHK (N.D. Cal.)**

Dear Daniel:

This letter responds to your May 7 letter regarding Intel's production of data and supplements my May 10 email response. To be clear, Intel's data production is complete; Intel has already provided Plaintiffs with all of the responsive data fields that Intel maintains, as well as all of the data entered in those fields. (Regarding the seven individuals whose records were produced in an unreadable format, we have reformatted the files and will produce them tomorrow.) Nonetheless, while Intel's data production is complete, we appreciate that Plaintiffs seek additional detail regarding that data and provide it herein.

In response to your request for a data dictionary, I attach as Exhibit A an explanation of the values found in the fields identified in Plaintiffs' letter. Regarding the recruiting data, it is separated into yearly worksheets based on the date the open position was filled. The "CandidateNo" field contains valid values even though some are negative. This data was migrated from prior systems. The "null" values in the recruiting data indicate that Intel does not have the data or that it is not applicable. If, for example, a candidate did not provide information such as the identity of that candidate's former employer, this would appear as a null value in the data. To take another example, if a candidate was not hired, that candidate would not have employee data such as grade, hire date, or employee status. Finally, you should disregard the "CandidateType" field, which indicates whether a candidate was internal or external at the time the data was pulled. The more accurate field is "ExtOrIntCandidate," which indicates whether a candidate was internal or external at the time of application.

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Having provided the above explanation and the data dictionary accompanying this letter, Intel trusts that Plaintiffs will not pursue their teleconference request. If you have additional questions regarding Intel's data production, however, please provide them to me so we can consider how best to address them.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Sujal J. Shah". The signature is fluid and cursive, with the first name "Sujal" being more prominent than the last name "Shah".

Sujal J. Shah

Enclosure